

# Exhibit A

- Summons and Complaint
- Certificate of Service

|                                       |   |                                    |
|---------------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA               | ) | IN THE COURT OF COMMON PLEAS       |
| COUNTY OF RICHLAND                    | ) | FIFTH JUDICIAL CIRCUIT             |
| David Voros and Alexandra Stasko,     | ) | Civil Action No.: 2022-CP-40-_____ |
|                                       | ) |                                    |
| Plaintiffs,                           | ) |                                    |
|                                       | ) | <b>SUMMONS</b>                     |
| vs.                                   | ) | <i>(Jury Trial Demanded)</i>       |
|                                       | ) |                                    |
| The McClatchy Company, LLC, d/b/a The | ) |                                    |
| State, and Lucas Daprille,            | ) |                                    |
|                                       | ) |                                    |
| Defendants.                           | ) |                                    |

**TO: THE ABOVE-NAMED DEFENDANTS AND THEIR ATTORNEYS:**

YOU ARE HEREBY SUMMONED and required to answer the Amended Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscribed, the HHP Law Group, LLC, located at 924 Gervais Street, Columbia, South Carolina, 29201, within thirty (30) days after the service hereof, exclusive of the date of such service. If you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

Respectfully submitted,

March 17, 2022  
Columbia, South Carolina

s/ William R. Padget  
William R. Padget (SC # 72579)  
Christina M. Brown (SC #104085)  
HHP LAW GROUP, LLC  
924 Gervais Street  
Columbia, SC 29201  
Tel: 803-400-8277 (office)  
Email: bill@hhplawgroup.com  
Email: christina@hhplawgroup.com  
*Attorneys for the Plaintiffs*

|                                       |   |                                    |
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| STATE OF SOUTH CAROLINA               | ) | IN THE COURT OF COMMON PLEAS       |
| COUNTY OF RICHLAND                    | ) | FIFTH JUDICIAL CIRCUIT             |
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| David Voros and Alexandra Stasko,     | ) | Civil Action No.: 2022-CP-40-_____ |
|                                       | ) |                                    |
| Plaintiffs,                           | ) |                                    |
|                                       | ) |                                    |
| vs.                                   | ) | <b>COMPLAINT</b>                   |
|                                       | ) | <i>(Jury Trial Demanded)</i>       |
| The McClatchy Company, LLC, d/b/a The | ) |                                    |
| State, and Lucas Daprille,            | ) |                                    |
|                                       | ) |                                    |
| Defendants.                           | ) |                                    |

**TO: THE ABOVE-NAMED DEFENDANTS AND THEIR ATTORNEYS:**

COMES NOW Plaintiffs David Voros and Alexandra Stasko, by and through their undersigned counsel, complaining of the Defendant the State and Lucas Daprille, who would respectfully allege and show as follows:

**THE PARTIES, JURISDICTION, VENUE, AND APPLICABLE LAW**

1. At all times pertinent to this action, David Voros and Alexandra Stasko ("Plaintiffs") are citizens and residents of Richland County, State of South Carolina.

2. Defendant, The McClatchy Company, LLC, d/b/a The State, (hereinafter "The State") is a news organization, incorporated in the State of Delaware and doing business in Richland County, South Carolina.

3. Defendant Lucas Daprille, upon information and belief, is a citizen and resident of Richland County, State of South Carolina. Upon information and belief, he is a news reporter and at all times material to this case, an employee of The State.

4. This Court has jurisdiction over the parties and venue is appropriate pursuant to S.C. Code Ann. § 15-7-30.

**FACTS COMMON TO ALL CAUSES OF ACTION**

5. Plaintiff David Voros is a Professor of Studio Art at the University of South Carolina School of Visual Art and Design. He has been employed as a professor at the University of South Carolina for approximately twenty-five (25) years and has taught thousands of students during his tenure at the university. He is also an owner of the International Center for the Arts, located in Monte Castello, Italy, a business that hosts retreats and events promoting the study of the arts and humanities in an historic Italian setting.

6. Plaintiff Alexandra Stasko was formerly an instructor at the University of South Carolina teaching Figure Structure and Ceramic classes. She is formerly a master's student at the University of South Carolina.

7. Leading up to December 2, 2020, Defendants published a series of stories and hosted several online events relating to claims of harassment made by several individuals against Professor Voros, which also had serious negative implications and insinuations relating to Professor Stasko.

8. In a December 2, 2020 article entitled "USC protected professor repeatedly accused of sexual harassment, lawsuit alleges" the Article inaccurately states that USC "failed to protect students and faculty from a professor repeatedly accused of sexual misconduct, two new lawsuits allege."

9. This article goes on to state that David Voros was previously sued by "a former student alleging he made unwanted sexual advances on her."

10. This reporting was and is a complete misrepresentation of the prior allegations made by Allison Dunavant, and importantly Ms. Dunavant had previously recanted many of these allegations in sworn deposition testimony taken in April of 2019.



11. This information being readily available to The State, had a thorough, complete and fair investigation had been conducted, and upon information and belief, the Defendants knew or should have know of this sworn deposition testimony at the time of this publication.

12. Further, on March 12, 2021, Defendant Daprile publicly states, "I have read the legal documents in the Dunavant case," on his Twitter account.

13. This article also states that both the new lawsuits accuse Voros of sexually harassing them, was and remains patently false, as the allegations made by Jamie Meisenhiemer do not support this statement.

14. The article also states that a "student's complaint, described in the lawsuit alleges that Voros traded employment benefits to female faculty and or graduate students for sexual favors." It was well known by the USC community that these statements were directed at Professor Stasko.

15. These statements were false, defamatory, and made without a justifiable basis and/or without a reasonable belief and portray the events in a false light.

16. Further, Defendants' reporting constitutes abuse of the fair reporting privilege due to its one-sided nature and the egregious failure to investigate or report on other exculpatory information readily available as part of that litigation.

17. As a result of these false and defamatory statements, the reputations of both Plaintiffs have been irreparably damaged, and have suffered embarrassment, humiliation, and mental suffering, along with pecuniary losses.

18. Further, in a March 12, 2021 article titled, "Women claim USC mishandled their sexual harassment claims," Defendant Daprile linked a document of *excerpts* of Lauren Chapman's deposition, a close friend of Jaimie Misenhiemer and individual deposed in Allison Dunavant's

lawsuit, and not her *full* deposition. These excerpts were a one-sided representation of Lauren Chapman's full deposition.

19. Further, Plaintiffs have made demand for retraction of these false and defamatory statements made by Defendants and Defendants have refused to respond to Plaintiffs' demand for retraction.

**FOR A FIRST CAUSE OF ACTION**  
(Defamation)

20. Plaintiffs reassert and re-alleges the paragraphs above as if fully set forth herein verbatim.

21. The above-described statements made by Defendants were false, defamatory, and tend to impeach the honesty, integrity, virtue, and reputation of Plaintiffs and portray them in a false light. And expose them to public hatred, contempt, ridicule, obloquy, and cause injury to them in their positions as Professors at the University of South Carolina.

22. Defendants published these false and defamatory statements to be viewed by an unlimited number of people via both its print and digital media.

23. Upon information and belief, these false and defamatory statements were made by Defendants with actual or implied malice, and/or with recklessness, ill will with a design to wantonly injure Plaintiffs without justifiable cause.

24. The false and defamatory statements made by Defendants concerned the Plaintiffs.

25. As a direct and proximate result of Defendants' false and defamatory statements, Plaintiffs have suffered damage and will suffer in the future damages, including, irreparable damage to their reputations, embarrassment, professional discipline, loss of employment opportunities, humiliation, mental suffering, along with substantial pecuniary losses.

26. Plaintiffs are entitled to an award of actual, consequential, and punitive damages in an amount to be proven at trial.

27. Plaintiffs demand a jury trial as to all claims.

**WHEREFORE**, the Plaintiffs pray that the Court hold the Defendants liable for the conduct complained of herein; to enter judgment against the Defendants and in favor of the Plaintiffs; and to award actual damages, consequential damages, punitive damages, and for other such relief as this Court deems just and equitable.

Respectfully submitted,

March 17, 2022  
Columbia, South Carolina

s/ William R. Padget  
William R. Padget (SC # 72579)  
Christina M. Brown (SC #104085)  
HHP LAW GROUP, LLC  
924 Gervais Street  
Columbia, SC 29201  
Tel: 803-400-8277 (office)  
Email: bill@hhplawgroup.com  
Email: christina@hhplawgroup.com  
*Attorneys for the Plaintiffs*

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

David Voros and Alexandra Stasko,

Plaintiffs,

vs.

The McClatchy Company, LLC d/b/a The  
State, and Lucas Daprille,

Defendants.

IN THE COURT OF COMMON PLEAS

Civil Action No.: 2022-CP-40-01391

**CERTIFICATE OF SERVICE  
CERTIFIED MAIL**

Caitlynne Havird personally appeared before me and stated the following under oath:

I am not less than 18 years of age. I am not an attorney in this action. I am not a party in this action.

I served the following:

**Summons and Complaint**

in the above matter upon The McClatchy Company, LLC d/b/a The State, by mailing the same by certified restricted, RRR, mail by United States Postal Service. Mailing was made on March 17, 2022 from the United States Postal Service. The envelope was addressed as follows:

**The McClatchy Company, LLC  
d/b/a The State  
Attn: CT Corporation System  
2 Office Park Court, Suite 103  
Columbia, South Carolina 29223**

The United States Postal Service Proof of Delivery is attached labeled as Exhibit "A", showing being accepted by Lisa Culter, on March 21, 2022.

SWORN TO before me this 24th  
day of March, 2022

  
Notary Public for South Carolina  
My Commission Expires: 6/25/2028

  
Caitlynne Havird  
HHP Law Group, LLC  
924 Gervais Street  
Columbia, South Carolina 29201  
(803) 400-8277  
caitlynne@hhplawgroup.com



3/23/22, 8:24 AM

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☒ Certified Mail Restricted Delivery \$ 6.00

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage \$ 1.36

Total Postage and Fees \$ 14.16

Sent To The McClatchy Company LLC d/b/a The State  
 Street and Apt. No., or PO Box No. 2 Office Park Court, Suite 103 Attn: CT Corporation  
 City, State, ZIP+4® Columbia, SC 29223 System

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

The McClatchy Company LLC  
d/b/a The State  
Attn: CT Corporation System  
2 Office Park Court, Suite 103  
Columbia, SC 29223



9590 9402 6983 1225 9382 71

## 2. Article Number (Transfer from service label)

7021 2720 0000 1307 5104

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

Line.com☐ Agent☐ Addressed

## B. Received by (Printed Name)

3/21/22D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

## 3. Service Type

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Domestic Return Receipt

**See Less** ^**EXHIBIT**

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